

EX

4

12
51

107

2013 DEC 23 AM 11:40
CLERK OF COURT C.P. & G.S.
FLORENCE COUNTY, S.C.

FILED

(2013-cv-21-95)
The Hon. William H. Seals, Jr.
12th Judicial Presiding Judge
P. O. Box 143
Marion SC 29571

(178039) Dec 20, 2013
Robert Graham Jr.
✓ applicant
State of South Carolina
Respondent

Sworn Affidavit
Motion for Judgment

personally appeared before me duly
sworn.

CERTIFIED: A TRUE COPY
Clerk of Court
CLERK OF COURT C.P. & G.S.
FLORENCE COUNTY, S.C.

(1) applicant filed/served notice and motion
for relief judgment by summons upon
the state, pursuant to S.C. Code Ann 17-
27-70(c) on the pleadings, affidavits,
pursuant to odom, anstine, and wilson,
legal and factual genuine issues of
material facts, how he is entitled to relief
judgment as a matter of law and facts,

(2) assistant attorney Joshua D. Thomas
only responded in part to applicants
reasons why the conditional and
final order should not become final.

(3) pursuant to scrcp and (frcp) 12 and 14) 2012
failure to respond to a verments; pleadings
is an admission to the assertions, arguments
and pleadings. is an admission.

(4) Mr. Thomas [intends] for you Judge seals
to sign a final order of dismissal, without
including the notice and motion filed
before the court 2013, oct 24 AM 11:45 am,

(5) This [must] be included in your 59(c) motion
pursuit to pratt v. state, according to findings
of facts and conclusions of law.

(6) Mr. Thomas answered all applicants objections
except this one, Dec 4, 2013, applicant received
his proposed order to you for final dismissal.
He is in default pursuant to (Rule 56)
and (Scrcp 12 and 11 and 14)

(7) If you are going to allow him to over-looked
procedures, and not respond to applicants
proper filed motion for relief judgement.
Please at least include it in your altering
and amending judgement pursuant to 59(c)

sworn to subscribe before me
This 20 day of 2013 December
Camecia C. Powell
Notary Public

My Commission Expires
September 25, 2023

Hon William H. Sears
P.O. Box 143
Marion SC 29571

K. J. [Signature]
12-20-13